

CITY OF FOUNTAINS
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KANSAS CITY
MISSOURI

Public Services Department

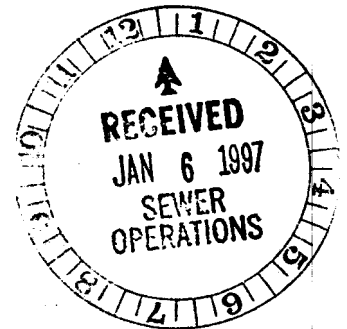
Industrial Waste Control Division
Suite 2500 - Oak Tower
324 East 11th Street
Kansas City, Missouri 64106

Area Code-816
Auditing & Accounts* 274-1451
Engineering Services* 274-1755
Industrial Waste* 274-1652
*FAX 545-5144
Reading & Service* 274-2404
*FAX 274-2975
Line Maintenance 274-2800
FAX 274-2818
Sewage Treatment 231-8373
FAX 231-5674
Water Supply 454-6233
FAX 454-9916

December 30, 1996

CERTIFIED MAIL P 188 933 835
RETURN RECEIPT REQUESTED

Mr. Tom McNally
Wastewater Treatment, Incorporated
3604 Fremont
Kansas City, MO 64129



REF: Heatway; Springfield, MO

Dear Mr. McNally:

According to Mr. Randy Lyman with the City of Springfield, Heatway is not considered a categorical industrial user (CIU), since they operate a cleaning process only. He is unsure if Heatway performs any of the six processes listed in the Code of Federal Regulations (CFR) for the Metal Finishing industry. However, he stated that the industry is in the grey area (possibly categorical).

After reviewing the documents supplied by Mr. Lyman, the Metal Finishing (40 CFR 433) regulations, and the Development Document for Effluent Limitations Guidelines and Standards for the Metal Finishing Point Source Category (EPA440/1-82/091-b), the City of Kansas City, Missouri believes this company to be a CIU and believes Springfield may have to classify them as such eventually.

Specifically, a memo dated May 21, 1996, states that Heatway uses Almco #2510 (corrosive) and #2420, (rust inhibitor) in the treatment of brass, copper, and zinc fittings. The corrosive is citric acid. According to the development document, citric acid is a common chelating agent used in electroless plating.

3131 IN CHESTNUT EXPOUY.

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The ingredients in the rust inhibitor are not known by the department. However, electroless plating involves a chemical reduction process that deposits metals in solution onto the surface of a base metal. This thin layer protects the base metal from rust and corrosion.

Further, the analytical data supplied in WTI's monthly report shows levels of copper, lead and zinc in excess of categorical/local limits. This indicates that copper and zinc are being removed from the fittings. This type of discharge to the sewer system is what the EPA wishes to limit.

Companies often confuse plating and coating processes with cleaning, especially those that use a single tank (with several compartments) to perform the surface preparations/cleaning. This does not exempt them from categorical regulation.

Although Heatway presently is not classified as a categorical user by Springfield's Pretreatment Program, it is highly possible that the City of Springfield will have to regulate them as a CIU in the future. To protect WTI from unknowingly collecting categorical waste and treating it inappropriately, it is advisable to handle any wastestreams from Heatway as categorical.

If any questions arise, call me at 274-2949.

Sincerely,

Denise R. Burkett
Industrial Waste Control Division

cc: R. Williamson
R. Lyman